UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CIVIL NO. 98-1664 (FAB)
	)	CIVIL NO. 98-2344 (FAB)
vs.	)	Consolidated Cases
	)	
33.92536 ACRES OF LAND, MORE	)	
OR LESS, SITUATED IN VEGA BAJA,	)	
COMMONWEALTH OF PUERTO RICO,	)	
AND JUAN PIZA-BLONDET, AND	)	
UNKNOWN OWNERS	)	
	)	
Defendants.	)	

UNITED STATES' MOTION FOR LEAVE TO FILE REPLY MEMORANDUM AND ACCOMPANYING SPANISH LANGUAGE EXHIBIT

Plaintiff United States of America ("Plaintiff" or the "Government") hereby respectfully requests that this Court grant leave for the United States to file the attached Reply memorandum in support of its Motion to Exclude Defendant's Highest and Best Use Evidence, or, in the Alternative, For an Evidentiary Hearing (Docket Entry 132).

Local Rule 7.1(c) contemplates the filing of a reply memorandum with prior leave of the Court. The United States' Reply is intended to serve the interests of justice and assist this Court by clarifying and correcting the erroneous and misleading assertions contained in Defendant's Response (Docket Entry 145). In accordance with Local Rule 7.1(c), the United States' Reply is strictly confined to addressing new matter raised in Defendant's Response.

The United States further requests leave to file as an exhibit to its Reply several Spanish language documents that have been exchanged during the course of discovery and that were discussed at the deposition of the United States' rebuttal fact witness, Mr. Julio Toro. In an effort to conserve limited resources, the United States is awaiting the Court's ruling on the

United States' pending motions (Docket Entries 132 and 133) before determining which of the more than five hundred Spanish language documents exchanged during discovery should be translated for use at trial. The United States' Reply and accompanying exhibits are filed as attachments to this motion.

Respectfully submitted this 11th day of October 2006.

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of October 2006, a true and correct copy of the foregoing motion was served via email and electronic notification to:

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